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10 Attorneys for Defendants  
11 ROBINHOOD MARKETS, INC.;  
ROBINHOOD FINANCIAL LLC;  
12 ROBINHOOD SECURITIES, LLC

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

17 SETH STEWART, individually and as a  
representative of the class,

18 Plaintiff,

19 vs.

20 ROBINHOOD FINANCIAL, LLC,  
21 ROBINHOOD MARKETS, INC. and  
ROBINHOOD SECURITIES, LLC,

22 Defendants.  
23

Case No.:

**DECLARATION OF MILES  
WELLESLEY IN SUPPORT OF NOTICE  
OF REMOVAL**

24 I, Miles Wellesley, hereby declare and state as follows:

25 1. I am over the age of eighteen and competent to testify to the facts stated herein. If  
26 called upon to testify, I could and would testify competently to the matters set forth herein.

27 2. I submit this declaration in support of the notice of removal filed by Robinhood  
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1 Markets, Inc., Robinhood Financial LLC and Robinhood Securities, LLC (collectively,  
2 “Robinhood”).

3 3. I currently am the Vice President of Corporate Development & Growth  
4 Partnerships at Robinhood Markets, Inc. I have been employed by Robinhood Markets for over  
5 six years. In my capacity, I am familiar with Robinhood Markets’ operations, corporate activities,  
6 and relationship with its various subsidiaries, including Robinhood Financial LLC and Robinhood  
7 Securities, LLC.

8 4. Robinhood Markets, Inc. is a Delaware corporation with a principal place of  
9 business in Menlo Park, California.

10 5. Robinhood Financial LLC is a Delaware limited liability company. Robinhood  
11 Markets, Inc. is the sole owner and member of Robinhood Financial LLC.

12 6. Robinhood Securities, LLC is a Delaware limited liability company. Robinhood  
13 Markets, Inc. is the sole owner and member of Robinhood Securities, LLC.

14 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
15 and correct.

16 Executed this 7th day of January 2021, at Nashville, Tennessee.

17  
18 DocuSigned by:

19 Miles Wellesley

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20 Miles Wellesley  
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